

Ask

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**FILED**

AUG 25 2023 JC

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTALLEN J. GORDON(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)**23-cv-6130**  
**Judge Hunt**  
**Magistrate Judge Kim**  
**Random/PC4**

vs.

Case no. \_\_\_\_\_

(To be supplied by the Clerk of this Court)TPR Christopher E. EHLERS # 6131 individual & official capacityOfc. Woods # 566 individual & official capacitySup. Martinez # 5162 individual & official capacity.MARKAM police DepartmentCity of MarkamIllinois state police Department(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")**CHECK ONE ONLY:**☒ **COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983**  
U.S. Code (state, county, or municipal defendants)☐ **COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE**  
**28 SECTION 1331 U.S. Code (federal defendants)**☐ **OTHER (cite statute, if known)****BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: GORDON 22 C 3510
- B. Approximate date of filing lawsuit: \_\_\_\_\_
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ALLEN Joseph Gordon
- D. List all defendants: Officer Ismail Nader  
Officer VICTOR Guebara  
City of Chicago
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Federal Northern District of Illinois Eastern Division
- F. Name of judge to whom case was assigned: Judge Kendall  
Magistrate Harjani
- G. Basic claim made: ~~Pattern~~ Excessive FORCE
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): still pending in negotiations
- I. Approximate date of disposition: start date July 7, 2022

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**IV. Statement of Claim:**

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

ON OCTOBER 20, 2018 Tpr. EHLERS #6131 Officer I.D. at the location of (15860 Dxy Hwy) JP Petrolum mobile gas pump 6 requested I exit a vehicle so he may conduct a search of my person. Melvin Miles, Zed Graham, Amarilis Rivera & the owner of the vehicle (Dodge charger) ZAKIR Bey were also located in & around the vehicle. No search was done on them, after discovering no weapons, no drugs, on my person. Tpr. EHLERS then began to search ZAKIR BEY vehicle & recovered an "firearm" black TAURUS PT111 G2 9mm from an blue leather jacket he found inside the (Dodge charger) Ofc. Woods #566 of the MARKAM police Dept was on the scene as well assisting Tpr. EHLERS. Tpr. EHLERS upon discovering the "9mm" placed only me in handcuffs & then placed me in his police cruiser. Tpr. EHLERS then notified me, I was under arrest for "unlawful use of a weapon".

Numerous of police began showing-up from the MARKAM & HARVEY police department to assist Tpr. EHLERS & Ofc. Woods. At 2:48 A.M Tpr. EHLERS read me miranda warning.



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Miles, Graham, ZAKIR Bey & Rivera were released from the scene. NO questioning or investigation was done to find out who the firearm belong too. Tpr. EHLERS initiated arresting me and bringing criminal charges against me, maliciously. Tpr. EHLERS knew the vehicle did not belong to me. Tpr. EHLERS also knew there were four other individuals - suspects that the firearm could had belong too. Yet! NO questions were asked by him, Tpr. EHLERS had a body CAM on his person, but he did not have it on. Ofc. Woods & other members of the Markham & Harvey police Department failed to act & uphold the law. TPR. EHLERS transported me to M1 squad room for processing. Once there Tpr. EHLERS contacted ASA Carolyn of Cook County State Attorney Felony review office.

TPR. EHLERS adamantly press the official ASA Carolyn to approve the criminal complaint. Supervisor Martinez is personally involved as well, he had the opportunity to correct officers EHLERS infraction. But instead he also approved Tpr. EHLERS statement & complaint and ofc. Woods of Markham police Dept. back it up.

In the circuit court of Cook County Illinois, Markham, IL I ~~for~~ the next 35 months was prosecuted & for 14 of those months <sup>detained</sup> ~~imprisoned~~ in Cook County Jail, with a NO BOND. TPR. EHLERS, Ofc. Woods & Sup. Martinez had sufficient degree of control in the initiation of the prior proceedings that had commenced. I have suffered, damages & injury due to this prosecution.

The criminal proceedings began OCT 20, 2018 & did not conclude until September 08, 2021. I was found "Not Guilty" by 12 juror of my peers, CASE number 18CR1593101

SID Number 052929220

IR Number 1758467

I am bringing my Complaint against

- Tpr. EHLERS #6131 malicious prosecution & pre-trial unlawful detention violating my 4<sup>th</sup> amendment constitutional rights
- Ofc. Woods #566
- Sup. Martinez #5162
- I am also bringing suit against Markam police Department and the City of Markam for BAD Training & BAD Hiring.
- I am also bringing suit against the Illinois state police Department for Bad training & hiring
- \* I seek indemnification from the Markam police Department, the City of Markam and the Illinois state police for the reasons listed above.

This case did not conclude until Sept. 08, 2021, so I am within the 2 year period to bring a lawful suit against these person's and entities for malicious prosecution & Unlawful pre-trial detention.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Relief Compensatory Damages - Monetary  
 • LOST OF income (job)  
 • COST OF Defense  
 • LOSS Apt became Homeless unable to afford my rent  
 • mental & Emotional distress due to Homelessness  
 • All this while the COVID-19 pandemic was going on

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 17 day of Aug, 2023

Allen J. Goran  
 (Signature of plaintiff or plaintiffs)

Allen J. Goran  
 (Print name)

N/A  
 (I.D. Number)

1416 E. 68<sup>th</sup> Street Apt 3W  
Chicago, IL 60637  
 (Address)